

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

DECLARATION OF DOUGLAS HANDSHOE

I, Douglas Handshoe, declare the following to be true and correct, and if called as a witness, I could competently testify to the matters hereinafter set forth which are within my personal knowledge. Under penalty of perjury I, swear and affirm the following:

CASE SUMMARY

I am the Plaintiff / Counter defendant in this matter. This is a case about the misuse of the United States copyright laws as one of many tactics in a campaign of libel terrorism and related Canadian smear campaigns directed towards Plaintiff and Plaintiff's lawyers in Mississippi and Louisiana from Canada, a country without the Free Speech and procedural due process protections contained in the United States Constitution, in an attempt to suppress truthful reporting on matters

in the public court record involving a massive political corruption scandal, resulting criminal investigation, conviction and incarceration of former Jefferson Parish President Aaron Broussard. In one of many such corrupt self-enrichment schemes perpetrated by Broussard, he used his Canadian property holdings managed by his unindicted criminal co-conspirators, Charles Leary, Vaughn Perret and Daniel Abel, to perpetrate bribery and money laundering schemes involving politically connected individuals that did substantial business with the Parish of Jefferson, Louisiana. Abel, Leary and Perret have since misused libel and intellectual property laws to silence news reporting on this matter of public interest in a campaign of libel terrorism.

DECLARATION OF FACTS AND EVIDENCE

1. Attached as Exhibit 2 is the Leary email to Magistrate Gargiulo dated December 21, 2018.
2. I can verify that Mr. Leary has misrepresented communications between the litigants to the Court with regards to settlement discussions that he has now used as a basis to have the Court sanction me.
3. On May 7, 2018 Leary emailed Handshoe asking if he would be open to settle. On the same date Handshoe replied, telling Leary that he would be, “more than happy to listen to any offer to settle...”
 - a. On May 9, 2018 Leary made his settlement offer.

- b. On May 10, 2018 Handshoe made Leary a counter offer.
4. I have attached the entire settlement email chain as Exhibit 3 to this Declaration.
5. Leary has now twice misrepresented these communications to the Court, the first time in an email to Magistrate Gargiulo dated May 15, 2018 which is attached a Exhibit 4 and the second time in his sworn declaration dated December 20, 2018 (*See* ECF 319) where Leary swore that Handshoe has “never made a proactive settlement offer to me”.
6. At all times I have conducted this litigation in good faith and with the utmost of diligence. This is especially true given my status as a pro se litigant.
7. That at all time periods between the 2012 barrage of takedown notices and the filing of the Complaint, that Handshoe did his best to research the issues involved and even waited for *Lenz* to resolve in order to ascertain his legal rights.

I swear and affirm I have examined the Exhibit 1 through 4 and they are true and correct.

So certified this the 10th day of January, 2019,

A handwritten signature in blue ink, appearing to read 'Douglas Handshoe', is written over a horizontal line.

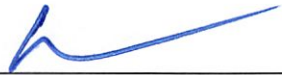
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on January 10, 2019 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on January 10, 2019, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada

Respectfully submitted this 10th day of January, 2019,



Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com